

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI

In Re:

Christopher Lloyd Funkhouser, and Elizabeth Ann
Funkhouser, *Debtor*

Christiana Trust, a division of Wilmington Savings Fund
Society, FSB, as Trustee for Normandy Mortgage Loan Trust,
Series 2013-8, by Rushmore Loan Management Services,
LLC, loan servicing agent for *Moving Creditor*

vs.

Christopher Lloyd Funkhouser, and Elizabeth Ann
Funkhouser, *Debtor*

and

John V. LaBarge, Jr., *Trustee*

)
) Case No. 14-45821-399
)

) Chapter: 13
)

) NOTICE OF MOTION FOR
) RELIEF FROM STAY
)

) Filed By: Christiana Trust, a
) division of Wilmington Savings
) Fund Society, FSB, as Trustee
) for Normandy Mortgage Loan
) Trust, Series 2013-8
)

) Original Hearing Date:
) November 4, 2015
)

) Original Hearing Time:
) 10:00 AM
)

Steven L. Crouch, #2903
Daniel A. West, #98415
Wendee Elliott-Clement (MBE
#50311; KS #20523)
Ashley B. Osborn (MBE
#59427; KS #23272)
6363 College Blvd. Suite 100
Overland Park, KS 66211
(913) 663-7600

PLEASE TAKE NOTICE, that upon the Motion of Christiana Trust, a division of Wilmington
Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-8

dated the 10th day of April, 2015, seeking the termination of the automatic stay with regard to
the real property legally described as follows:

THE FOLLOWING LAND SITUATE IN SAINT LOUIS COUNTY, MISSOURI,
TO WIT: ALL THAT PARCEL OF LAND IN SAINT LOUIS COUNTY, STATE
OF MISSOURI, AS MORE FULLY DESCRIBED IN DEED BOOK 15198, PAGE
700, ID No. 26J540114, BEING KNOWN AND DESIGNATED AS LOT 4, IN
BLOCK B, OF ALPINE ACRES, ACCORDING TO THE PLAT THEREOF
RECORDED IN ST. LOUIS COUNTY RECORDER'S OFFICE., commonly known
as 9329 Lenard Court, Saint Louis, MO (the "Property")

the undersigned will move for an order of relief before the Honorable Judge Barry S. Schermer, at 111 South Tenth Street, Courtroom 5 North, St. Louis, Missouri, on November 4, 2015, at 10:00 am, or as soon thereafter as counsel can be heard.

SOUTHLAW, P.C.

/s/Daniel A. West

Steven L. Crouch, (MBE #37783; EDMO #2903; KSfD #70244)

Daniel A. West (MBE #48812; EDMO #98415; KSfD #70587)

Wendee Elliott-Clement (MBE #50311; KS #20523)

Ashley B. Osborn (MBE #59427; KS #23272)

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ATTORNEYS FOR CREDITOR

TO:

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Elizabeth Ann Funkhouser
9329 Lenard Court
Saint Louis, MO 63123
DEBTOR

Michael E. Doyel
10820 Sunset Office Dr., Ste 124
St. Louis, MO 63127
ATTORNEY FOR DEBTOR

John V. LaBarge, Jr.
P.O. Box 430908
St. Louis, MO 63143
CHAPTER 13 TRUSTEE

Office of the United States Trustee
111 South 10th Street, Suite 6353
St. Louis, MO 63102
UNITED STATES TRUSTEE

SOUTHLAW, P.C.
/s/Daniel A. West
Steven L. Crouch, (MBE #37783; EDMO #2903; KSfD #70244)
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